

09/695,493

PATENTAMENDMENT A (IN RESPONSE TO PAPER NO. 6
(OFFICE ACTION DATED MARCH 30, 2004))REMARKS

Claims 1-36 are pending in this case. (Claims 1, 2, 13, 14, 25 and 26 have been amended hereinabove to correct obvious typographical errors.) Based upon the following remarks, it is respectfully submitted that these claims are allowable.

Claims 1-36 were rejected under 35 U.S.C. §102(e) as being anticipated by Shiigi, U.S. Patent No. 6,304,898 ("Shiigi"). This rejection is respectfully traversed and it is submitted that these claims recite subject matter which is not anticipated by and is patentable over Shiigi.

Independent Claims 1, 13 & 25

According to the Examiner, Shiigi teaches a method, computer program code and a system for facilitating user interface roaming, including all elements recited in subparagraphs (a)-(f). As discussed in more detail below, it respectfully submitted that the position of the Examiner is untenable. Throughout the following discussion, two terms, among others, are used for which definitions are provided in the present disclosure, particularly at: Figure 1; page 6, line 3, through page 8, line 29; page 13, line 9, through page 16, line 3; and page 18, line 1, through page 20, line 10. More specifically, as expressly taught in the present disclosure, the presently claimed invention uses a wireless link to do scan its vicinity to detect one or more interface clients, following which information relating to such interface clients is transmitted to an infrastructure server. Based on such transmitted information, the infrastructure server selects one of the interface clients, notifies the wireless link of such selection, initiates a connection with the selected interface client and initiates communication. Such "interface client" is external to the "wireless link" which serves as the actual communication engine, and the infrastructure server, as its name suggests, is separate, and typically remote, from

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09/695,493

AMENDMENT A (IN RESPONSE TO PAPER NO. 6
(OFFICE ACTION DATED MARCH 30, 2004))

both the "wireless link" and "interface client".

As to subparagraph (a), Shiigi neither teaches nor suggests "receiving from the wireless link a list of usable interface clients in proximity to the wireless link, wherein each usable interface client has capabilities associated therewith". As is clearly shown in Figure 1A of Shiigi, the system taught by Shiigi does not include a wireless link which is separate from an interface client and serves as the communication engine. In the Shiigi system of Figure 1A, the pen device is merely an input device, no different than a keyboard or mouse, and the client computer serves as both the interface client as well as the communication engine for communicating with the server computer. As a result, there is no wireless link from which the server computer can receive a list of interface clients separate from such wireless link. Although portions of Shiigi, as cited by the Examiner, mentioned the use of digital cell phones, such devices are identified as being the client computer which, as noted, serves as both the visual interface and the link.

As to subparagraph (b), Shiigi neither teaches nor suggests "selecting one of the interface clients from the list". As discussed above, Shiigi neither teaches nor suggests interface clients external to the actual communication engine.

As to subparagraph (c), Shiigi neither teaches nor suggests "notifying the wireless link of the selected interface client". As discussed above, Shiigi neither teaches nor suggests interface clients separate from the wireless link.

As to subparagraph (d), Shiigi neither teaches nor suggests "initiating a connection with the selected interface client". As discussed above, Shiigi neither teaches nor suggests interface clients separate from the wireless link. As a result the system of Shiigi cannot initiate a connection with an interface client separate from the wireless link which initiated the original communication with the server.

09/695,493

PATENTAMENDMENT A (IN RESPONSE TO PAPER NO. 6
(OFFICE ACTION DATED MARCH 30, 2004))

As to subparagraph (e), Shiigi neither teaches nor suggests "executing an application based on the capabilities of the selected interface clients, wherein execution of the application generates content". Shiigi, as cited by the Examiner, expressly teaches the execution of an application and generation of content by the client computer. In contrast thereto, in the presently claimed invention, it is the server, and not the interface client, that executes such application and generates the content.

As to subparagraph (f), Shiigi neither teaches nor suggests "transmitting the generated content to the interface client". As noted, Shiigi, as cited by the Examiner, expressly teaches execution of an application and generation of content by the interface client, as opposed the server. Further, Shiigi, as cited by the Examiner, expressly teaches the conveyance of any generated content to some other client computer, and not to the selected interface client as required by the claim.

Dependent Claims 2-12

As to Claim 2, as discussed above, Shiigi neither teaches nor suggests a wireless link in the form of a communication engine external to the interface client. Accordingly, Shiigi also neither teaches nor suggests receiving notification from a wireless link which has been activated and determines usable interface clients in proximity thereto upon activation thereof.

As to Claim 3, as discussed above, Shiigi neither teaches nor suggests a wireless link separate from the interface client. Accordingly, Shiigi also neither teaches nor suggests initiation of a connection with the selected interface client via the wireless link.

As to Claim 4, as discussed above, Shiigi neither teaches nor suggests the

11602.00.0004
CHICAGO/#1221360.1

11

09/695,493

PATENTAMENDMENT A (IN RESPONSE TO PAPER NO. 6
(OFFICE ACTION DATED MARCH 30, 2004))

generating of content by the server and transmission of such content to the interface client. Accordingly, Shiigi also neither teaches nor suggests transmission of such content to the interface client via a wireless link separate from such interface client.

As to Claim 6, Shiigi neither teaches nor suggests "receiving information from the user based on the generated content, generating subsequent content based on the received information, and transmitting the subsequently generated content to the interface client". As discussed above the presently claimed invention uses a wireless link as a communication engine separate from the interface client used for providing a display. Further, as expressly taught in the present disclosure, information from the user is introduced to the system via the wireless link. Accordingly, since Shiigi, as discussed above, neither teaches nor suggests a wireless link separate from the interface client, Shiigi then also neither teaches nor suggests receipt of information from the user via such wireless link separate from the interface client, as well as transmission of subsequently generated content to such separate interface client.

As to Claim 7, Shiigi neither teaches nor suggests the claimed subject matter. As discussed above, Shiigi neither teaches nor suggests a wireless link separate from the interface client. Further, Shiigi, as cited by the Examiner, neither teaches nor suggests switching among interface clients; indeed, without a wireless link separate from the interface clients, no such switching is possible. Moreover, Shiigi, as cited by the Examiner, neither teaches nor suggests transmitting generated content to another interface client following a response from the user indicating that the user wishes to switch to such other interface client.

As to Claim 8, as discussed above, Shiigi never teaches nor suggests the wireless link separate from the interface clients. Accordingly, Shiigi can also

11602.00.0004
CHICAGO/#1221368.1

12

09/695,493

PATENTAMENDMENT A (IN RESPONSE TO PAPER NO. 6
(OFFICE ACTION DATED MARCH 30, 2004))

neither teach nor suggest receipt of the generated content by the wireless link when the list of useable interface clients includes zero useable interface clients in proximity to the wireless link.

As to Claim 9, as discussed above, Shiigi never teaches nor suggests a wireless link separate from the interface client. Accordingly, Shiigi also neither teaches nor suggests receipt of information from such separate wireless link input by a user.

As to Claim 10, as discussed above, Shiigi neither teaches nor suggests a wireless link separate from the interface client. Accordingly, Shiigi also neither teaches nor suggests communication, irrespective of protocol, between such separate wireless link and interface client.

As to Claim 11, Shiigi, as cited by the Examiner, neither teaches nor suggests a wireless link having telephony capabilities. While Shiigi teaches a network connection by modem over a dial-up telephone line, such connection merely represents a data communication capability, as opposed to a voice communication capability as expressly taught by the present disclosure.

As to Claim 12, Shiigi, as cited by the Examiner, neither teaches nor suggests "uploading from a data store information relating to configuring the application based on the capabilities of the selected interface client". As discussed above, in the presently claimed invention, the application is executed based on the capabilities of the selected interface client with content being generated accordingly, followed by transmission of the generated content to the interface client. Accordingly, any uploading of information relating to the capabilities of the selected interface client is done in conjunction with such application execution and content generation prior to the transmission of the content to the selected interface client. In contrast thereto, Shiigi, as cited by the Examiner, teaches the presence of

11602.00.0004
CHICAGO/#1221368.1

13

09/695,493

PATENTAMENDMENT A (IN RESPONSE TO PAPER NO. 6
(OFFICE ACTION DATED MARCH 30, 2004))

application software within the client computer where content is generated, i.e., the client, and not the server, generates the content for transmission. In Shiigi, the server merely acts as a conduit for conveying the content transmitted by the client.

Claims 14-24 & 26-36

As to Claims 14-24 and 26-36, reference is made to the remarks herein above for Claims 1-12, 13 and 25, and are incorporated herein by reference.

Conclusion

Claims 1-36 remain pending in this case. Based upon the foregoing remarks, it is respectfully submitted that these claims are allowable, and reconsideration and early allowance of these claims are requested.

Respectfully submitted,

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11602.00.0004
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14